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11 Attorneys for Defendant
12 LG. PHILIPS LCD AMERICA, INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Omni Circuits International, LLC, individually
and on behalf of all those similarly situated,

Plaintiff,

vs.

LG. Philips LCD Co. Ltd., LG. Philips LCD
America, Inc.; Samsung Electronics Co. Ltd.;
Sharp Corporation; Sharp Electronics
Corporation; Toshiba Corporation; Toshiba
Matsushita Display Technology Co., Ltd.;
Hitachi Ltd.; Hitachi Displays, Ltd.; Hitachi
America Ltd.; Hitachi Electronic Devices
(USA), Inc.; Sanyo Epson Imaging Devices
Corporation; NEC Corporation; NEC LCD
Technologies, Ltd.; NEC Electronics America,
Inc.; IDT International Ltd.; AU Optronics;
International Display Technology Co., Ltd.;
International Display Technology USA Inc.;
AU Optronics Corporation America; Chi Mei
Optoelectronics; Chi Mei Optoelectronics
USA, Inc.

Defendants.

CASE NO. C 07-00258 (JSW)

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Honorable Jeffrey S. White

1 WHEREAS plaintiff filed a complaint in the above-captioned case on or about
 2 January 16, 2007;

3 WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid
 4 Crystal Display (“LCD”) products;

5 WHEREAS more than six complaints have been filed to date in federal district
 6 courts throughout the United States by plaintiffs purporting to bringing class actions on behalf of
 7 direct purchasers alleging antitrust violations by manufacturers of LCD products (collectively,
 8 “the LCD Cases”);

9 WHEREAS there is a motion pending before the Judicial Panel on Multidistrict
 10 Litigation to transfer the LCD Cases to the Northern District of California for coordinated or
 11 consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

12 WHEREAS plaintiff anticipates the possibility of Consolidated Amended
 13 Complaints in the LCD Cases;

14 WHEREAS plaintiff and LG. Philips LCD America, Inc. (“LPL America”) have
 15 agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be
 16 more efficient for the parties and for the Court;

17 WHEREAS plaintiff agrees that the deadline for LPL America to respond to the
 18 Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after
 19 the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after
 20 plaintiff provides written notice to LPL America that he does not intend to file a Consolidated
 21 Amended Complaint, provided that such notice may be given only after the initial case
 22 management conference in the MDL transferee court in this case;

23 WHEREAS plaintiff further agrees that this extension is available, without further
 24 stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of
 25 their intention to join this extension;

26 WHEREAS this Stipulation does not constitute a waiver by LPL America or any
 27 defendant of any defense, including but not limited to the defenses of lack of personal or subject
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1 matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper
2 venue.

3 PLAINTIFF AND DEFENDANT LPL AMERICA, BY AND THROUGH THEIR
4 RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

5 1. The deadline for LPL America to respond to the Complaint shall be
6 extended until the earlier of the following two dates (1) forty-five days after the filing of a
7 Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff
8 provides written notice that he does not intend to file a Consolidated Amended Complaint,
9 provided that such notice may be given only after the initial case management conference in the
10 MDL transferee court in this case.

11 2. This extension is available, without further stipulation with counsel for
12 plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of
13 their intention to join this extension.

14 IT IS SO STIPULATED.

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16 DATED: February 5, 2007

17 Respectfully submitted,
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20 MUNGER, TOLLES & OLSON LLP
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23 By: _____ /s/ *Matthew J. Spence*
24 JEROME C. ROTH
25 MATTHEW J. SPENCE
26 Attorneys for Defendant
27 LG. PHILLIPS LCD AMERICA, INC.

28 Of Counsel for Defendant:

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38

1 DATED: February 5, 2007

GOLD BENNETT CERA & SIDENER LLP

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4 By: /s/ Joseph M. Barton
JOSEPH M. BARTON

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7 Attorneys for Plaintiff
8 OMNI CIRCUITS INTERNATIONAL, LLC

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11 PURSUANT TO STIPULATION, IT IS SO
12 ORDERED:

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14 Dated: February 8, 2007

15 
16 Honorable Jeffrey S. White
17 Judge of the United States District Court

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19 CERTIFICATION

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21 I, Matthew J. Spence, am the ECF User whose identification and password are being used to file
22 this Stipulation For Extension Of Time. In compliance with General Order 45.X.B, I hereby
23 attest that Joseph M. Barton has concurred in this filing.

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